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ELECTRONICALLY FILED
DOC #:

DATE FILED: 7/22/2025



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File Number:

July 21, 2025

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VIA ECF

The Honorable Valerie Caproni
United States District Judge
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

Re: *Wang v. Essence International Financial Holdings Limited*, Case No. 1:24-cv-08204-VEC-HJR

Dear Judge Caproni:

Under Section II.C of Your Honor's Individual Practices in Civil Cases, we write on behalf of our client Essence International Financial Holdings Limited ("Essence International") respectfully to request an extension of thirty (30) days to file an objection to Magistrate Judge Ricardo's July 14 Report and Recommendation (ECF No. 33).

On July 14, Magistrate Judge Ricardo issued his Report and Recommendation recommending dismissal of Plaintiff's Section 10(b) claim as time-barred under the statute of repose, but denying the motion to dismiss Plaintiff's Section 20A claim. Objections to that Report and Recommendation would be due July 28, 2025. See Fed. R. Civ. P. 72(b). Granting this thirty-day extension would make the objection(s) due on August 27, 2025.

This extension request seeks to accommodate Essence International's legitimate needs. Counsel for Essence International are scheduled to fly to Hong Kong on July 22 for out-of-country depositions and have multiple summary-judgment and motion-to-dismiss briefs due in a similar time frame. Additional time is therefore needed to prepare the Rule 72 objection(s) in this case. Plaintiff does not oppose to this request. This is Essence International's first request for an extension of time to file a Rule 72 objection.

Respectfully submitted,

/s/ Jonathan Rosenberg

Jonathan Rosenberg

cc: Plaintiff via ECF and email (saratoga10172023@gmail.com)

Application GRANTED IN PART. Defendant's deadline to file an objection to the Report and Recommendation at Dkt. 33 is ADJOURNED from Monday, July 28, 2025, to **Thursday, August 7, 2025**. Plaintiff's deadline to respond to Defendant's objection is **Thursday, August 21, 2025**.

The Court will not further extend the above-referenced deadlines.

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Valerie Caproni".

7/22/2025

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE